IN THE UNITED STATES DISCTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

CONNER SLEVIN,)
Plaintiff,	
vs.) Case No.: 3:23-cv-01404-YY
AB HOLLYWOOD, LLC, a limited liability) UNOPPOSED MOTION FOR
company,	ORDER GRANTING LEAVE TO
) FILE SURREPLY
Defendant.)

COMES NOW, Jessica Molligan, Plaintiff's former counsel, and respectfully moves this Court for an Order granting leave of Court to allow her to file a Surreply to Defendant's Reply to her Response to Defendant's Motion for Rule 11 Sanctions. In compliance with LR 7-1, I have conferred with Defendant's counsel and Plaintiff's current counsel. Defendant's counsel does not object so long as they would be permitted an opportunity to respond to any new argument or evidence brought in the Surreply. Plaintiff's current counsel does not object.

Plaintiff's former counsel will state and show the following, in support, to wit:

- That Defendant raised issues not originally raised in its Motion for Sanctions to which Plaintiff's former counsel would like to respond and clarify;
- 2. Plaintiff's former counsel proposes that the Surreply shall not exceed 8 pages and be due 5 days from the filing of this Motion.
- 3. The Surreply will not raise any new argument or evidence.

WHEREFORE, Plaintiff's former counsel prays:

- For an Order granting leave of Court to file a Surreply not to exceed 8 pages within 5 days of the filing of this Motion; and
- 2. For any other relief, specific or general, to which she may be entitled.

Dated: October 30, 2024

Respectfully submitted,

/s/ Jessica Molligan
Jessica Molligan
Oregon State Bar No.:001823
PO Box 16893
Portland, OR 97292
503-975-2920
jessicamolligan@comcast.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the October 30, 2024, the foregoing document

was served on the Service List via electronic mail:

Service List:

Iain M. R. Armstrong Iain.Armstrong@lewisbrisbois.com Nicky C. Blumm Nicky.Blumm@lewisbrisbois.com LEWIS BRISBOIS BISGAARD & SMITH LLP 888 SW Fifth Avenue, Suite 900 Portland, Oregon 97204-2025 Telephone: 971-712-2800 Facsimile: 971-712-2801

Kevin Mehrens Attorney at Law 3918 NE Garfield, Unit B Portland, OR 97212 Kevin.mehrens@gmail.com

> /s/ Jessica Molligan Jessica Molligan